

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREENWICH INVESTORS XXIV, LLC,)
Plaintiff,)
v.) Case No. 07 C 6466
WALTER JOHNSON II, ANN L. DOMIKAITIS,)
A AND W, INC. and)
ENTERPRISE INDUSTRIES, INC.,)
Defendants.)

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
WALTER JOHNSON II, ANN L. DOMIKAITIS, A AND W, INC.
AND ENTERPRISE INDUSTRIES, INC.**

Plaintiff, Greenwich Investors XXIV, LLC ("Greenwich"), by its attorneys, Jason D. Altman and David C. Kluever of Kluever & Platt, LLC, and for its Fed. R. Civ. P. 55(b)(2) motion for default judgment on its amended complaint against the defendants, Walter Johnson II, Ann L. Domikaitis, A and W, Inc. and Enterprise Industries, Inc., states as follows:

1. On November 14, 2007, Greenwich filed its complaint against defendants Walter Johnson II ("Johnson"), Ann L. Domikaitis ("Domikaitis"), A and W, Inc. ("AW") and Enterprise Industries, Inc. ("EI").
2. Johnson was served with the complaint on December 22, 2007. *See* Affidavit of Service, attached and incorporated herein as Exhibit A.
3. Domikaitis was served with the complaint on November 21, 2007. *See* Affidavit of Service, attached and incorporated herein as Exhibit B.
4. AW and EI were served with the complaint on November 28, 2007. *See* Affidavits of Service, attached and incorporated herein as Exhibits C and D.

5. On January 3, 2008, Greenwich filed its amended complaint, a copy of which is attached and incorporated herein as Exhibit E.

6. None of the defendants have either appeared or filed responsive pleadings to the complaint or amended complaint.

7. The allegations of Greenwich's amended complaint are proven-up by the affidavit of Brooke E. Powell, attached and incorporated herein as Exhibit F.

8. The underlying promissory note and guarantees (attached as Exhibits A, D and E, respectively to Exhibit E) provide for the award of Greenwich's attorney's fees and costs in this action. The affidavit of Jason D. Altman, attached and incorporated herein as Exhibit G, reflects Greenwich's attorney's fees and costs in this action.

WHEREFORE, Plaintiff, Greenwich Investors XXIV, LLC moves that this Court enter judgment in its favor and against:

- 1) Walter Johnson II and Ann L. Domikaitis jointly and severally in the amount of \$132,666.85;
- 2) A and W Inc., in the amount of \$132,666.85; and
- 3) Enterprise Industries, Inc. in the amount of \$132,666.85.

GREENWICH INVESTORS XXIV, LLC

By: s/Jason D. Altman
One of its attorneys

Jason D. Altman (ARDC# 06224378)
Kluever & Platt, LLC
65 East Wacker Place, Suite 2300
Chicago, Illinois 60601
(312) 236-0077